



Your business  
is our business.

REDACTED FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200  
Greenbelt, Maryland 20770  
phone: 301-459-7590, fax: 301-577-5575  
internet: www.jsitel.com, e-mail: jsi@jsitel.com

June 29, 2015

**Via Hand Delivery**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 14-58  
2015 ETC Annual Report of Wilkes Telephone & Electric Co.  
Study Area Code 220394**

Dear Ms. Dortch:

On behalf of Wilkes Telephone & Electric Co. ("Wilkes"), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.<sup>1</sup> Wilkes seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.<sup>2</sup> The redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of its Progress Report on its Five-Year Service Quality Improvement Plan as required by Section 54.313(a)(1).<sup>3</sup>

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

<sup>1</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>2</sup> *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 15-712 rel. June 17, 2015 (Protective Order). 47 C.F.R. § 54.313(f)(2).

<sup>3</sup> 47 C.F.R. §§ 0.457, 0.459, 54.313(a)(1).



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June 29, 2015

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 14-58  
2015 ETC Annual Report of Wilkes Telephone & Electric Co.  
Study Area Code 220394  
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. (“JSI”), on behalf of its client Wilkes Telephone & Electric Co. (“Company”) hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission’s rules,<sup>1</sup> withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).<sup>2</sup>

1. The information for which the Company is seeking confidential treatment is an attachment to the Company’s annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission’s rules (“Report”).<sup>3</sup>
2. Pursuant to Section 54.313(a)(1), Rate-of-Return Eligible Telecommunications Carriers (“ETCs”) must file with the Commission a Progress Report on its Five-Year Service Quality Improvement Plan (“Progress Report”) which is contained in the attachment to the 2015 Report.<sup>4</sup>
3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company’s Five-Year Plan provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.

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<sup>1</sup> 47 C.F.R. §§ 0.457, 0.459.

<sup>2</sup> 47 C.F.R. § 0.459(b)(1) through (9).

<sup>3</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>4</sup> 47 C.F.R. §§ 54.313(a)(1).

4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."<sup>5</sup> The Company's Progress Report updates this information as well as provides maps and detailed information as to whether or not network improvement objectives were achieved at the wire center level. Accordingly, because the Company is a rate-of-return carrier, it must file Progress Reports which contain proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.

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<sup>5</sup> See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para 9 citing Section 54.202(a) (1) (ii).

6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing the attachment under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.
7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. Not applicable.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,



John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

<010> Study Area Code	220394
<015> Study Area Name	WILKES TEL & ELC CO
<020> Program Year	2016
<030> Contact Name: Person USAC should contact with questions about this data	Jayne B. Callaway
<035> Contact Telephone Number: Number of the person identified in data line <030>	7066789531 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	jbcallaway@nu-z.net

<b>ANNUAL REPORTING FOR ALL CARRIERS</b>	<b>54.313</b>	<b>54.422</b>
	<b>Completion Required</b>	<b>Completion Required</b>

			<i>(check box when complete)</i>	
<100> Service Quality Improvement Reporting	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200> Outage Reporting (voice)	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input checked="" type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	<input type="text" value="0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310> Detail on Attempts (voice)	<div style="border: 1px solid black; height: 40px; width: 100%;"></div> <i>(attach descriptive document)</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)	<input type="text" value="0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330> Detail on Attempts (broadband)	<div style="border: 1px solid black; height: 40px; width: 100%;"></div> <i>(attach descriptive document)</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)				
<410> Fixed	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<440> Fixed	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450> Mobile	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	<i>(check to indicate certification)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> <input type="text" value="220394ga510.pdf"/>	<i>(attached descriptive document)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	<i>(check to indicate certification)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> <input type="text" value="220394ga610.pdf"/>	<i>(attached descriptive document)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710> Company Price Offerings (broadband)	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800> Operating Companies and Affiliates	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)?	<input type="radio"/> <input checked="" type="radio"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000> Voice Services Rate Comparability Certification	<input type="text" value="Yes"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010> <div style="border: 1px solid black; height: 40px; width: 100%;"></div>	<i>(attach descriptive document)</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1100> Certify whether terrestrial backhaul options exist (Yes or No)	<input checked="" type="radio"/> <input type="radio"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>	<i>(complete attached worksheet)</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

**Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet**

<i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>			
<2000>	<i>(check to indicate certification)</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<2005>	<i>(complete attached worksheet)</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet**

<3000>	<i>(check to indicate certification)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<3005>	<i>(complete attached worksheet)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

**(100) Service Quality Improvement Reporting Data Collection Form**

FCC Form 481  
 OMB Control No. 3060-0986/OMB Control No. 3060-0819  
 July 2013

<010> Study Area Code 220394  
 <015> Study Area Name WILKES TEL & ELC CO  
 <020> Program Year 2016  
 <030> Contact Name - Person USAC should contact regarding this data Jayne B. Callaway  
 <035> Contact Telephone Number - Number of person identified in data line <030> 7066789531 ext.  
 <039> Contact Email Address - Email Address of person identified in data line <030> jbcallaway@nu-z.net

<110> Has your company received its ETC certification from the FCC?  (yes / no)   
 If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?  (yes / no)

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.



Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113> Maps detailing progress towards meeting plan targets	Yes
<114> Report how much universal service (USF) support was received	Yes
<115> How much (USF) was used to improve service quality and how support was used to improve service quality	Yes
<116> How much (USF) was used to improve service coverage and how support was used to improve service coverage	Yes
<117> How much (USF) was used to improve service capacity and how support was used to improve service capacity	Yes
<118> Provide an explanation of network improvement targets not met in the prior calendar year.	Not Applicable







**(800) Operating Companies  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code 220394

<015> Study Area Name WILKES TEL & ELC CO

<020> Program Year 2016

<030> Contact Name - Person USAC should contact regarding this data Jayne B. Callaway

<035> Contact Telephone Number - Number of person identified in data line <030> 7066789531 ext.

<039> Contact Email Address - Email Address of person identified in data line <030> jbcallaway@nu-z.net

<810> Reporting Carrier Wilkes Telephone and Electric Co.

<811> Holding Company Dycom Holding, Inc.

<812> Operating Company Wilkes Telephone and Electric Co.

<813>	<a1>	<a2>	<a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation

-- See attached worksheet --



**(1100) No Terrestrial Backhaul Reporting  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	220394
<015>	Study Area Name	WILKES TEL & ELC CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jayne B. Callaway
<035>	Contact Telephone Number - Number of person identified in data line <030>	7066789531 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jbcallaway@nu-z.net

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

**(1200) Terms and Condition for Lifeline Customers  
Lifeline  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code 220394  
 <015> Study Area Name WILKES TEL & ELC CO  
 <020> Program Year 2016  
 <030> Contact Name - Person USAC should contact regarding this data Jayne B. Callaway  
 <035> Contact Telephone Number - Number of person identified in data line <030> 7066789531 ext.  
 <039> Contact Email Address - Email Address of person identified in data line <030> jbcallaway@nu-z.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans  
 <1220> Link to Public Website  HTTP  
 Name of Attached Document  
 220394gsa1210.pdf

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,
- <1222> Details on the number of minutes provided as part of the plan,
- <1223> Additional charges for toll calls, and rates for each such plan.

(2000) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code 220294

<015> Study Area Name WILKES TEL & ELC CO

<020> Program Year 2016

<030> Contact Name - Person USAC should contact regarding this data Jayne B. Callaway

<035> Contact Telephone Number - Number of person identified in data line <030> 7066769531 ext.

<039> Contact Email Address - Email Address of person identified in data line <030> jpcallaway@nu-z.net

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2010> 2nd Year Certification (47 CFR § 54.313(b)(1)i)
- <2011a> 3rd Year Certification (47 CFR § 54.313(b)(1)ii)
- <2011b> Attachment (47 CFR § 54.313(b)(1)ii)

Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))

- <2012> 2013 Frozen Support Calculation (47 CFR § 54.313(c)(1))
- <2013> 2014 Frozen Support Calculation (47 CFR § 54.313(c)(2))
- <2014> 2015 Frozen Support Calculation (47 CFR § 54.313(c)(3))
- <2015> 2016 and future Frozen Support Calculation (47 CFR § 54.313(c)(4))

Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))

Certification Support Used to Build Broadband

Connect America Phase II Reporting (47 CFR § 54.313(e))

- <2017> 3rd year Broadband Service Certification
- <2018> 5th year Broadband Service Certification
- <2019> Interim Progress Certification

<2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

- <2021> Interim Progress Community Anchor Institutions

Name of Attached Document(s) Listing Required Information

Name of Attached Document(s) Listing Required Information



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(3000) Rate Of Return Carrier Additional Documentation (Continued)  
Data Collection Form  
FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	220394
<015>	Study Area Name	WILKES TEL & ELC CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jayne B. Callaway
<035>	Contact Telephone Number - Number of person identified in data line <030>	7066789531 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jbcallaway@nu-z.net

Financial Data Summary

(3027) Revenue	[REDACTED]
(3028) Operating Expenses	[REDACTED]
(3029) Net Income	[REDACTED]
(3030) Telephone Plant In Service(TPIS)	[REDACTED]
(3031) Total Assets	[REDACTED]
(3032) Total Debt	[REDACTED]
(3033) Total Equity	[REDACTED]
(3034) Dividends	[REDACTED]

<b>Certification - Reporting Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	220394
<015>	Study Area Name	WILKES TEL & ELC CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jayne B. Callaway
<035>	Contact Telephone Number - Number of person identified in data line <030>	7066789531 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jbcallaway@nu-z.net

**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:**

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

<b>Certification - Agent / Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<b>&lt;010&gt;</b>	Study Area Code	220394
<b>&lt;015&gt;</b>	Study Area Name	WILKES TEL & ELC CO
<b>&lt;020&gt;</b>	Program Year	2016
<b>&lt;030&gt;</b>	Contact Name - Person USAC should contact regarding this data	Jayne B. Callaway
<b>&lt;035&gt;</b>	Contact Telephone Number - Number of person identified in data line <030>	7066789531 ext.
<b>&lt;039&gt;</b>	Contact Email Address - Email Address of person identified in data line <030>	jbcallaway@nu-z.net

**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:**

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
<p>I certify that (Name of Agent) <u>John Staurulakis, Inc.</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.</p>	
Name of Authorized Agent:	John Staurulakis, Inc.
Name of Reporting Carrier:	WILKES TEL & ELC CO
Signature of Authorized Officer:	CERTIFIED ONLINE <span style="float: right;">Date: 06/26/2015</span>
Printed name of Authorized Officer:	April Dyson
Title or position of Authorized Officer:	President
Telephone number of Authorized Officer:	7066789531 ext.
Study Area Code of Reporting Carrier:	220394 <span style="float: right;">Filing Due Date for this form: 07/01/2015</span>
<small>Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.</small>	

**TO BE COMPLETED BY THE AUTHORIZED AGENT:**

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
<p>I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.</p>	
Name of Reporting Carrier:	WILKES TEL & ELC CO
Name of Authorized Agent or Employee of Agent:	John Staurulakis, Inc.
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE <span style="float: right;">Date: 06/26/2015</span>
Printed name of Authorized Agent or Employee of Agent:	Lans Chase
Title or position of Authorized Agent or Employee of Agent:	Staff Director - Regulatory
Telephone number of Authorized Agent or Employee of Agent:	7705692105 ext.1
Study Area Code of Reporting Carrier:	220394 <span style="float: right;">Filing Due Date for this form: 07/01/2015</span>
<small>Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.</small>	

## Attachments

**REDACTED – FOR PUBLIC INSPECTION**

**ATTACHMENT - LINE 112**

**Five-Year Network Improvement Plan and  
Progress Report**

**ATTACHMENT REDACTED IN ENTIRETY**

## **Demonstration of Complying with Applicable Service Quality Standards and Consumer Protection Rules for Voice and Broadband**

In establishing this certification in its *2005 ETC Order*,<sup>1</sup> the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”<sup>2</sup> The FCC found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement” and that the sufficiency of other commitments would be considered on a case-by-case basis.<sup>3</sup> In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”<sup>4</sup>

Wilkes Telephone and Electric Company, Inc. (“Company”) hereby certifies that it is in compliance with applicable service quality standards and consumer protection rules. Company is subject to consumer protection obligations under Georgia state law and federal law. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of the Georgia Public Service Commission which discloses rates, and terms and conditions of service to customers (Chapter 515-12-1-.02(5)(a) and .04(5) of the Rules and Regulations of the State of Georgia); (2) adherence to state consumer protection requirements governing telephone providers which require Service Standards (Chapter 515-12-1-.17 and .18 of the Rules and Regulations of the State of Georgia); Customer Billing (Chapter 515-12-1-.04(4) of

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<sup>1</sup> *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

<sup>2</sup> *Id.* at para. 28.

<sup>3</sup> *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

<sup>4</sup> *Id.* at n. 72.

the Rules and Regulations of the State of Georgia; and Customer Complaints (Chapter 515-12-1-.08 of the Rules and Regulations of the State of Georgia); (3) truth-in-billing requirements (Chapter 515-12-1-.04(4) of the Rules and Regulations of the State of Georgia); and (4) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

Company is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the 2015 Open Internet Order when it becomes effective.

## **Demonstration of Ability to Function in Emergency Situations for Voice and Broadband**

Wilkes Telephone and Electric Company, Inc. (“Company”) hereby certifies that it is able to function in emergency situations as set forth in §54.202(a)(2)<sup>1</sup> and Chapter 515-12-1-.11(4) of the Rules and Regulations of the State of Georgia. Company’s network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2) and Chapter 515-12-1-.11(4) of the Rules and Regulations of the State of Georgia. Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. Company has battery backup at all office locations and in its electronic equipment sites. Length of run time is determined by the equipment serving the area and the number of customers working out of the equipment. Company’s standby generators and battery back-up support both voice and broadband network equipment should an emergency situation occur.

---

<sup>1</sup> Section 54.202(a)(2) requires ETCs that are designated by the Commission to “demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.”

**GEORGIA SUFFERED A MAJOR ICE STORM AND COMMERCIAL POWER FAILURES ON JANUARY 28, 2014. WILKES WAS NOT SPARED IN THAT REGARD AND WE HAD APPROXIMATELY TEN HOURS OF COMPLETE COMMERCIAL POWER LOSSES AT SOME OF OUR SITES. WILKES WAS ABLE TO KEEP SERVICES FUNCTIONING BECAUSE WILKES HAS LONG INVESTED IN BACK UP POWER SOURCES (GENERATORS) AT ALL CRITICAL PLANT SITES AND AT THE CORPORATE OFFICE TO SUPPORT THE CUSTOMER BILLING PLATFORM SYSTEM WHICH SUPPORTS REVENUE TRACKING.**

**THE ATTACHED LIST IS REPRESENTATIVE OF 26 GENERATOR UNITS WHICH ARE DISPERSED WITHIN THE WILKES PLANT TERRITORY. THESE UNITS ARE MAINTAINED AND AUDITED ON A MONTHLY BASIS. SOME ARE PROPANE, WHILE OTHERS ARE DIESEL TO ENSURE THAT IF IN THE EVEN OF OUR ABILITY TO SECURE ONE OR THE OTHER TYPE OF FUEL SOURCE, WE HAVE A MEASURE OF REDUNDANT SUPPORTING PLANT. ALL LOCATIONS OTHER THAN THE MAIN CORPORATE OFFICE ARE REMOTE AND CENTRAL OFFICE LOCATIONS STRATEGICALLY LOCATED WITHIN THE OSP/CO FOOTPRINT AND IN THE EVENT OF PARTIAL OR COMPLETE COMMERCIAL POWER ARE EQUIPPED TO KEEP VOICE (E911 AND FULL VOICE COMPONENT SERVICES), BROADBAND AND VIDEO SUPPORTED SERVICES TO ENSURE THAT IF A CUSTOMER LOCATION IS FUNCTIONING WITH POWER- OUR SERVICES ARE SUPPORTED TO DELIVER THE SERVICES FOR WHICH THE SUBSCRIBER PAYS. THIS KEEPS EMERGENCY SERVICES INTACT.**







WILKES TELEPHONE & ELECTRIC COMPANY

LIFELINE SUBSCRIBERS PLANS-PROCEDURES-AVAILABILITY OF SERVICES STATEMENT

DOCUMENTATION FOR 2015

SAC 220394

# Nu-Z.net

- [E-mail](#)
- [About Us](#)
- [Help](#)
- [Policies](#)
- [Contact Us](#)

## Bill Pay

- [Home](#)
- [Voice](#)
- [Internet](#)
- [Business](#)
- [Television](#)
- [Security](#)

**FIBER TO THE HOME**  
**HOME**  
 DVR, HDTV, VIDEO & More  
**Future-Proofing Our Community**

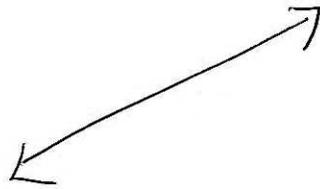


**Are You Eligible?** [Click Here for Details.](#)



WWW.NU-Z.NET

Webpage Links  
 Subscribers to  
 Lifeline information  
 Application / eligibility  
 documentation



SAC-220394





Save With Triple Play Bundles

**WHO'S WATCHING  
YOUR  
HOME?**

Wilkes Watchman  
**SECURITY**  **CLICK**

The advertisement features a white cordless phone on the left. To its right are several black security sensors of various shapes and sizes. The text is arranged in a bold, sans-serif font.

**ESPN3.com**

**Catch All the Action!**

Watch your favorite  
sporting events online  
on ESPN3!

**Go Now!**



# Lifeline Assistance Program Application and Certification Form

Send completed form to: P O Box 277 or 110 E Liberty St, Washington, GA 30673  
Fax (706)-678-1003 or (706) 359-7700

Telephone Number for which Lifeline Credits are to apply: \_\_\_\_\_

Date: \_\_\_\_\_ CSR Completing Form: \_\_\_\_\_ SO# \_\_\_\_\_ SO Type \_\_\_\_\_

**Applicant/Responsible Party:**

First Name: \_\_\_\_\_ MI: \_\_\_\_\_ Last Name: \_\_\_\_\_

Physical Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

My Physical Address is:  Permanent  Temporary  Multi-Household

Billing Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Applicant/Responsible Party DOB: \_\_\_\_\_

Applicant/Responsible Party Last Four Digits of SSN: \_\_\_\_\_

Alternate Contact Telephone Number Where You Can Be Reached Or Receive Messages: \_\_\_\_\_

**= NOTICE =**

**Lifeline is a federal benefit; only one Lifeline service is allowed per household; a household cannot receive benefits from more than one telephone service provider; a household is defined as any individual or group of persons living together at the same address sharing income and expenses (an economic unit); and Lifeline is a non-transferrable benefit. Households receiving Lifeline benefits from more than one telephone company will be de-enrolled. Prosecution by the federal government for this offence is possible.**

Are you or any member of your household already receiving Lifeline benefits from a telephone company?

YES  NO If yes, please be aware that only one Lifeline benefit is allowed for each household.

**= PROGRAM ELIGIBILITY CRITERIA =**

\_\_\_\_\_  
*(Please initial if applicable) I certify that either a member of my household or I participate in the below-marked assistance program. I understand I must provide satisfactory documentation of this participation to Wilkes Telephone & Electric Company (WTC).*

Full legal name of the person who is qualifying for the Lifeline Benefit (i.e. whose name is on the SNAP card, Medicaid card, etc.): \_\_\_\_\_

Relationship to the telephone applicant: \_\_\_\_\_

- Supplemental Nutrition Assistance Program (SNAP)
- Low Income Home Energy Assistance (LIHEAP)
- National School Lunch Program's Free Lunch Program
- Temporary Assistance for Needy Families (TANF)
- Food Distribution Program on Indian Reservations (FDPIR)
- State Assistance Programs (if applicable)
- Tribally-Administered Temporary Assistance for Needy Families (TTANF)
- Medicaid
- Supplemental Security Income (SSI)
- Federal Public Housing (Sect 8)
- Bureau of Indian Affairs General Assistance
- Head Start (if income eligibility criteria are met)

**Please See Reverse Side For Certification**

= Or =

\_\_\_\_\_ (Please initial if applicable) I certify under penalty of perjury that my total household income is at or below 135% of the Federal Poverty Guidelines. I understand I must provide satisfactory documentation of this declaration to WTC.

Number Of People In Your Household \_\_\_\_\_

Household Size	Total Income	Household Size	Total Income
1	\$15,889	2	\$21,505
3	\$27,121	4	\$32,737
5	\$38,353	6	\$43,969
7	\$49,585	8	\$55,201
Add \$5,616 for each additional person			

I am providing a photocopy of the following qualifying documents:

- Prior year's state or federal tax return
- Current income statement from an employer
- Paycheck stubs for most recent 3 months
- Social Security statement of benefits
- Child Support Document
- Divorce decree
- Retirement/pension statement of benefits
- Unemployment/Workmen's Compensation statement of benefits
- Federal notice letter of participation in General Assistance
- Veterans Administration Statement of Benefits
- Other official document containing income information

**I certify under penalty of perjury the following (initial by each certification):**

- \_\_\_\_\_ I currently meet Lifeline eligibility as indicated on Page One of this document.
- \_\_\_\_\_ I will notify WTC within 30 days if I or my qualifying household member cease(s) to meet program eligibility as specified on Page One or, for any reason, no longer meet(s) all Lifeline eligibility criteria. I certify that I understand and agree to comply with this notification requirement under penalty of perjury and prosecution.
- \_\_\_\_\_ If I move to a new address I will notify WTC within 30 days of my move.
- \_\_\_\_\_ If my address is temporary, I understand that I may be required to verify my address with WTC every 90 days.
- \_\_\_\_\_ I certify my household is not receiving nor will it receive Lifeline benefits from another telephone company such as Safelink, Assurance, and Reachout Wireless while enrolled in the Lifeline program with WTC.
- \_\_\_\_\_ I acknowledge that providing false or fraudulent information to receive Lifeline benefits is punishable by law and will result in program de-enrollment and possible program debarment, fines, or imprisonment.
- \_\_\_\_\_ I acknowledge that I will be required to provide proof of continuing program eligibility at least once each year when notified by WTC, and any failure to do so, on my part, will result in de-enrollment from the Lifeline Assistance Program.

Signature of Applicant: \_\_\_\_\_ Date: \_\_\_\_\_

**Space Reserved For Office Use**

- Date of eligibility review: \_\_\_\_\_
- Proof of applicants eligibility reviewed by: \_\_\_\_\_
- Date or expiration date of documentation: \_\_\_\_\_
- Identifying information about document submitted: \_\_\_\_\_
- Method the documentation was provided: \_\_\_\_\_
- Name on documentation demonstrating program participation: \_\_\_\_\_
- Certification that the individual named on the documentation who is demonstrating program participation is part of the applicant's household
- Certification that the individual named on the documentation who is demonstrating program participation does not already receive program supported service

**Unresolved complaints concerning Lifeline service can be directed to the Georgia Public Service Commission's Consumer Affairs Unit at 404-656-4501 or 1-800-282-5813**

## What is Lifeline?

Lifeline is a Federal program that offers telephone discounts to low-income consumers in all U.S. States and Territories. Those who qualify may receive discounts on monthly basic telephone services (Lifeline).

To determine your eligibility for Lifeline and to enroll in this program, contact your local Wilkes Telephone & Electric Company business office.

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You may be eligible for the Lifeline program if you participate in any of the following programs:

- Medicaid
- Supplemental Nutrition Assistance Program (SNAP)
- National School Lunch Program's Free Lunch Initiative
- Supplemental Security Income (SSI)
- Federal Public Housing Assistance (Section 8)
- Low-Income Home Energy (LIHEAP)
- Temporary Assistance for Needy Families (TANF)
- Food Distribution Program on Indian Reservations (FDPIR)
- Bureau of Indian Affairs General Assistance
- Tribally-Administered Temporary Assistance for Needy Families (TTANF)
- Head Start (if income eligibility criteria are met)
- State Assistance Programs (if applicable)
- Or if the household income is at or below 155% of the Federal Poverty Guidelines

WASHINGTON  
110 EAST LIBERTY STREET  
706-678-2121

LINCOLNTON  
155 SOUTH PEACHTREE STREET  
706-559-3111  
[WWW.NU-Z.NET](http://WWW.NU-Z.NET)  
[INFO@NU-Z.NET](mailto:INFO@NU-Z.NET)



## GET CONNECTED

## Learn More About Lifeline

### Low Cost Phone Service Guide

**AFFORD A PHONE**  
You may be eligible for greatly reduced local phone service.

The Lifeline program provides this benefit to eligible individuals and families.

Contact Your Local Business Office For More Information



General Subscriber Services Tariff  
Wilkes Telephone & Electric Company

Section H  
Contents  
Third Revised Sheet 1  
Cancels Second Revised Sheet 1

LOW INCOME PROGRAM

(T)

Contents

Sheet No.

H.1 Lifeline Assistance

1

H.2 (Deleted)

(D)

Issued: July 30, 2012  
By: George A. Dyson  
Name

Effective: June 1, 2012  
President  
Title

General Subscriber Services Tariff  
Wilkes Telephone & Electric Company

Section H  
Third Revised Sheet 1  
Cancels Second Revised Sheet 1

LOW INCOME PROGRAM

H.1 General

(T)

The Company, as part of its obligations as an Eligible Telecommunications Carrier, offers a low-income assistance program. This program, Lifeline Assistance, is offered under the terms and conditions provided below:

(C)

H.1.1 Lifeline Assistance

1. General

Lifeline Assistance is a non-transferable retail service offering for which qualifying low-income subscribers pay reduced charges, as provided for below. Lifeline Assistance enables eligible subscribers to pay reduced charges for voice telephony service that includes the following services: voice-grade access to the public switched network or its functional equivalent; local usage; access to emergency services; and toll limitation.

2. Regulations

Subscribers are eligible for Lifeline Assistance if:

- a. The subscriber's household income is at or below 135 percent of the Federal Poverty Guidelines, or
- b. The subscriber, or one or more of the subscriber's dependents or the subscriber's household, receives benefits from at least one of the following qualifying programs:

- Medicaid;
- Supplemental Nutrition Assistance Program (SNAP), formerly known as Food Stamps;
- Supplemental Security Income (SSI);
- Federal Public Housing Assistance;
- Low-Income Home Energy Assistance Program (LIHEAP);
- National School Lunch Program's free lunch program;
- Temporary Assistance for Needy Families (TANF);
- Low Income Senior Citizens discount plan offered by a local gas or power company

- c. Other eligibility requirements may be established by the Commission.

(C)

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General Subscriber Services Tariff  
Wilkes Telephone & Electric Company

Section H  
First Revised Sheet 2  
Cancels Original Sheet 2

## LOW INCOME PROGRAM

## H.1.1 Lifeline Assistance (Cont'd)

## 2. Regulations (Cont'd)

- (T)
- (C)
- d. Each subscriber to Lifeline Assistance must certify in writing to the Company, under penalty of perjury, that s/he receives benefits under a program outlined in sub-paragraphs (a) through (c), above, and must, on that same document, agree to notify the Company if s/he ceases to participate in the program(s). The certification form shall conform to the requirements described herein, and shall be made available upon request to any subscriber. The Company shall retain all such subscriber certifications in order to furnish proof of subscriber eligibility as may be required from time to time by Universal Service administrators.
- e. A subscriber may elect at the time of subscription to Lifeline Assistance to receive toll limitation as part of Lifeline Assistance. "Toll limitation" is a service that allows a subscriber to elect not to allow the completion of outgoing toll calls from the subscriber's residence.
- f. Lifeline Assistance will not be disconnected for non-payment of toll charges, unless the Company first demonstrates to the Commission that the Company would incur substantial costs, that the Company offers toll limitation without charge, and that telephone subscribership among low-income subscribers in the Company's service area is greater than or equal to the national subscribership rate for low-income consumers. For purposes of this paragraph, a "low-income consumer" is one with an income below the poverty level for a family of four residing in Georgia. The Company shall follow all applicable notice provisions as established, from time to time, by the Commission, as part of the waiver process, and to implement a waiver, if granted. The Company may reapply for the waiver as necessary.
- g. The Company may not collect a service deposit in order to initiate Lifeline Assistance if the qualifying low-income subscriber voluntarily elects toll blocking from the Company, where available or if the qualifying low-income subscriber elects a calling plan that does not distinguish between toll and non-toll calls in its pricing. If toll blocking is unavailable, then the Company may charge a service deposit. (C)

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Section H  
Third Revised Sheet 3  
Cancels Second Revised Sheet 3

LOW INCOME PROGRAM

H.1.1 Lifeline Assistance (Cont'd)

3. Effective August 1, 2012, the Lifeline credit available to an eligible customer in Georgia is equal to the total of federal support as established by the Federal Communications Commission. The amount of credit will not exceed the charge for local service, which includes the access line, the Subscriber Line Charge and local usage.
4. The Company shall apply the baseline payments received by the administrator of the federal Lifeline Assistance program to waive the qualifying customer's federal Subscriber Line Charge. The Company shall apply any additional federal support amount to the qualifying customer's basic local exchange service rate.
5. To be eligible for Lifeline Assistance, qualifying customers must subscribe to a flat-rate basic local exchange service offering that is made available in the Company's service area.
6. Partial payments that are received from Lifeline customers shall first be applied to local service charges and then to any outstanding toll charges.

(T)

(C)

(C)

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Section H  
First Revised Sheet 3.1  
Cancels Original Sheet 3.1

LOW INCOME PROGRAM

H.1.1 (Deleted)

(T)

(D)

(D)

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Section H  
First Revised Sheet 4  
Cancels Original Sheet 4

LOW INCOME PROGRAM

H.1.1 (Deleted)

(T)

(D)

H.1.2 (Deleted)

(D)

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(D)

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Title

Section H  
First Revised Sheet 5  
Cancels Original Sheet 5

LOW INCOME PROGRAM

H.1.2 (Deleted)

(T)

(D)

H.1.3 All aspects of the Lifeline Assistance program shall be subject to the interpretation of applicable Federal regulations and any directives which may from time to time be prescribed by the Universal Service Administrative Company. These rules are separate and apart from any rules prescribed as part of a state Universal Service program.

(D)

(C)

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Name

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President  
Title

**Wilkes Telephone & Electric Company  
General Subscriber Services Tariff**

**Section C  
Eleventh Revised Sheet 1.1  
Cancels Tenth Revised Sheet 1.1**

**LOCAL EXCHANGE SERVICE**

**C.1.1 LOCAL EXCHANGE SERVICE RATES (cont'd)**

**CLASS OF SERVICE**

The following rates for each local exchange are for basic residential residence and business network Access including Touch Tone:

Exchange	<u>MONTHLY RATES</u>			
	<u>Res.</u>		<u>Bus.</u>	
Crawfordsville	\$18.33	(I)	\$19.82	(I)
Lincolnton	\$19.60	(I)	\$19.82	(I)
Metasville	\$19.43	(I)	\$19.82	(I)
Rayle	\$19.28	(I)	\$19.82	(I)
Tignall	\$18.33	(I)	\$19.82	(I)
Washington	\$19.28	(I)	\$19.82	(I)

**C.1.2 Deleted**

**C.2**

(Relocated to Section M, Sheet 19)

**Issued: November 25, 2014  
By: George A. Dyson**

**Effective: January 1, 2015  
Title: President**

**Wilkes Telephone & Electric Company  
P.O. Box 277  
Washington, Georgia 30673**

**Wilkes Telephone & Electric Co - SAC 220394**

**Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))**

Wilkes Telephone & Electric Co - SAC 220394 hereby certifies that throughout 2014, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream, and currently, it is taking reasonable steps to provide upon reasonable request actual speeds of at least 10 Mbps downstream/1 Mbps upstream broadband service at with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas as determined in an annual survey, and that requests for such service are met within a reasonable amount of time.

**Wilkes Telephone & Electric Co - SAC 220394**

**Response to Line 3012 - List of Community Anchor Institutions to Which the ETC Newly Began Providing Service**

The FCC’s *USF/ICC Transformation Order* requires a listing of community anchor institutions to which the ETC newly began providing broadband service. Wilkes hereby provides the FCC with a list of community anchor institutions to which it newly began providing access to broadband service in calendar year 2014.<sup>1</sup>

<b>Number</b>	<b>Name</b>	<b>Address</b>
1	Department of Transportation	143 County Farm Rd WASHINGTON, GA 30673
2	Georgia Forestry Commission	1343 Tignall Rd WASHINGTON, GA 30673
3	Athens Technical College	Wilkes County WASHINGTON, GA 30673
4	Washington Manor	184 Pine Lane WASHINGTON, GA 30673
5	Wilkes County Courthouse	23 E Court St WASHINGTON, GA 30673
6	Mary Willis Library	204 E Liberty Street WASHINGTON, GA 30673
7	Washington-Wilkes Elementary School	109 East St WASHINGTON, GA 30673
8	Taliaferro County Board Of Education	364 Alexander St NW Crawfordville, GA 30631
9	Wilkes County Board Of Education	313 N Aleander Ave WASHINGTON, GA 30673

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<sup>1</sup> The FCC has defined community anchor institutions in Section 54.5 of its Rules as “schools, libraries, health care providers, community colleges, other institutions of higher education, and other community support organizations and entities.”

**REDACTED – FOR PUBLIC INSPECTION**

**ATTACHMENT - LINE 3017**

**ATTACHMENT REDACTED IN ENTIRETY**